

6

Where Are Mills Required to Demonstrate Compliance?

This section discusses EPA's determination of points at which mills with operations in Subparts B and E must show compliance with the rule. The regulation requires mills to demonstrate compliance with limitations at the point where wastewater leaves the bleach plant, as well as at the point where they discharge their treated effluent to the receiving stream (for direct dischargers).

The following subsections discuss the rationale for establishing the bleach plant compliance point; for a more complete discussion of the legal basis for requiring monitoring of in-process streams, refer to Section 8.2.3 of the Supplemental Technical Development Document (EPA 821-R-97-011, October 1997 www.epa.gov/OST/pulppaper/jd/std-d-v4.pdf).

Table 6-1 summarizes the compliance points for each pollutant regulated by the rule.

Direct Dischargers

Under 40 CFR 430, a direct discharger must demonstrate compliance with the limits for TCDD, TCDF, 12 chlorinated phenolic pollutants, and chloroform at the point where the wastewater containing these pollutants leaves the bleach plant from each individual fiber line before being combined with process

wastewaters or noncontact cooling water from other operations. (EPA refers to these in-process limits as "bleach plant effluent limits"). EPA determined that bleach plant effluent limits are necessary for these pollutants because chemical pulp bleaching is the principal source of these pollutants; the effluent from a mill's bleach plant is typically combined with other process wastewater and noncontact cooling water prior to treatment and discharge. Because of this, you would not be able to accurately assess compliance at the final mill effluent due to dilution with other mill wastewaters. In addition, bleach plant limits for chloroform are necessary because there is potential for volatilization and loss in mill sewer systems. For AOX, however, direct discharge mills must comply with end-of-pipe limits at the point where the final mill process wastewater effluent is discharged to receiving waters (i.e., at the end of the pipe).

Note: Some mills operate several individual fiber lines and associated bleach plants. As a result, these mills must meet limits for pollutants with bleach plant effluent limits for each individual fiber line bleaching plant.

Indirect Dischargers

Indirect dischargers must also demonstrate compliance with bleach plant effluent limits for TCFF, TCDF, 12 chlorinated phenolic pollutants, and, for mills with operations in Subpart B only, chloroform. EPA also established bleach plant effluent limits for AOX, rather than final effluent limits, because POTWs cannot achieve, through wastewater treatment alone, the degree of AOX removal achieved by the in-process technologies that form the basis of BAT. For more discussion on AOX bleach plant limits, refer to the Supplemental Technical Development Document.

Table 6-1: Compliance Points for Each Regulated Pollutant

Pollutant	Subpart B	Subpart E		
		Ammonium-Based Segment	Calcium-, Sodium-, Magnesium-Based Segment	Specialty-Grade Segment
TCDD	Bleach Plant	Bleach Plant	No requirement	Bleach Plant Effluent
TCDF	Bleach Plant	Bleach Plant	No requirement	Bleach Plant Effluent
Chloroform	Bleach Plant	Reserved	No requirement	Reserved
12 chlorinated phenolic pollutants	Bleach Plant	Bleach Plant	No requirement	Bleach Plant Effluent
AOX	Final Effluent (Directs) Bleach Plant Effluent (Indirects)	Reserved	Final Effluent (Directs) Bleach Plant (Indirects)	Reserved
COD	Reserved	Reserved	Reserved	Reserved